

# Administrative Review

## Overview

The Administrative Review is the process the USDA requires the State agency (SA) to use to assess program compliance with federal regulations. Modules associated with the Administrative Review can be accessed in MyIdahoCNP in the *Compliance* section. The review process is on a three year cycle; however, School Food Authorities (SFAs) may be reviewed more often at the SA's discretion. The process is designed to allow the SA to conduct specific aspects of the review on-site while other aspects are completed off-site.

The scope of the Administrative Review focuses on two primary review components: Critical Areas of Review and General Areas of Review. The Critical Areas encompass two performance standards. Performance Standard One focuses on certification, benefits issuance, and meal counting and claiming. Performance Standard Two focuses on meeting meal pattern and nutritional quality requirements. The General Areas of Review encompass resource management (financials), civil rights, SFA on-site monitoring (point of service counting reviews), local school wellness policy, Smart Snacks, water, food safety, the school meal environment, reporting and recordkeeping, and outreach. If implemented by the SFA, other federal child nutrition programs, including the School Breakfast Program, Special Milk Program, Afterschool Snack Program, and Fresh Fruit and Vegetable Program, will also be reviewed during the Administrative Review process. Please refer to the *USDA Administrative Review Manual*, available in the Additional Resources section of this reference guide, for additional guidance on the Administrative Review process and all topics discussed in this section.

## Terminology

Please use the below terms and their definitions as a reference when completing the off-site module questions in MyIdahoCNP, prior to the Administrative Review.

**Certification/Determination** - Process used in determining the eligibility status of each student, which includes approving or denying Free and Reduced applications, matching children on the direct certification list, and using the lists from the school district's Homeless or Migrant Liaison. (SFA Form 100)

**Benefit Issuance** - Documentation of meal benefit status conveyed to certified children. A benefit issuance list or master roster of all students and their eligibility status must be maintained. (SFA Form 100)

**Verification** - The process by which the SFA verifies that the eligibility of each student has been correctly determined by requesting documentation to support the income listed on the Application for Free and Reduced Price Meals. (SFA Form 200)

**Meal Counting and Claiming** - The daily process for counting and claiming reimbursable meals based on a student's eligibility category. (SFA Form 300)

**Dietary Specifications and Nutrient Analysis** - Assessing the menu for compliance with calories, saturated fat, trans fat, and sodium guidelines. **This analysis is performed by the State agency.** (SFA Form 600)

Resource Management - Review of the financial situation of the food service account. The district audit and detailed food service account will be reviewed by the SA. The questions in this module must be completed by the SFA 4-6 weeks prior to the on-site review. (SFA Form 700)

Civil Rights - Includes the annual civil rights training, complaint process, non-discrimination statements, and accommodations to ensure all students have equal access to the meal program, regardless of race, color, national origin, age, sex, or disability. Sponsors must keep copies of all training documentation including agendas and sign-in sheets for three (3) years plus current. (SFA Form 800)

SFA On-site Monitoring -Ensures that all schools are meeting program requirements; includes Point of Service (POS) counting reviews for all schools with more than one POS. Reviews are performed by February 1 of each year. (SFA Form 900)

Local Wellness Policy - District policy that addresses the health and wellbeing of students and the school environment. (SFA Form 1000)

Smart Snacks - Regulations affecting all food sold in school that is not served as part of the reimbursable meal. (SFA Form 1100)

School Breakfast and Summer Food Service Program Outreach – Sponsors are required to inform families of the school breakfast and summer food program benefits, if offered at that school or in the area. (SFA Form 1600)

Special Provisions Options - Module that is applicable only to schools that are operating Provision 2 or CEP. (SFA Form 2100)

### **What is the Administrative Review?**

The review process consists of an off-site portion and an on-site portion. Both the SFA and the SA will complete some work off-site, thus allowing the on-site review portion to be less cumbersome. As part of the off-site portion, the SFA is responsible for answering the questions in each module in the Off-Site Review Forms Section of MyIdahoCNP **(with an exception of Form 600 – Dietary Specifications and Nutrition Analysis)**. Each site being reviewed will also have specific module questions that must be answered. Please see the *Off Site Review Instructions* and *Off Site Assessment Tool* listed in MyIdahoCNP Download Forms for step-by-step directions on completing the off-site modules.

The SFA must submit several documents to the SA for review prior to the on-site visit. A notice of review letter is e-mailed to the SFA approximately six (6) weeks prior to the date of the on-site review, providing a detailed list of exactly which documents should be submitted to the SA ahead of time. These documents should be uploaded in the Review Attachments section of MyIdahoCNP.

The on-site portion of the review validates the information submitted by the SFA and allows the SA to observe the operation of the school nutrition programs implemented in that district. Again, refer to the notice of review letter for a detailed list of exactly which documents must be ready for review when the

SA arrives on site. In addition to reviewing documents, the SA will also conduct the following while on site:

- Entrance conference (optional)
- Observation of meal production including use of production records and standardized recipes
- Observation of meal services, both breakfast and lunch, including the counting and claiming procedures and service of reimbursable meals
- Observation of the kitchen, cafeteria, and any other areas where student meals or food are served and stored including dry storage, refrigerators, and freezers
- Observation of additional Child Nutrition Programs (CNP) that are offered including the Special Milk Program, Fresh Fruit and Vegetable Program, and Afterschool Snack Program
- Validation that vending machines, a la carte items, and other non-reimbursable food items sold during the school day are in compliance with Smart Snacks (All Foods Sold in School) regulations

An exit conference is conducted at the end of the on-site portion of the review. It is expected the food service director, school superintendent, and any other staff involved in the implementation and monitoring of the National School Lunch and Breakfast Programs are present at the exit conference (i.e. business manager, food service supervisors). The exit conference will summarize:

- Administrative Review findings
- Corrective action plan and timeframe for completion
- Technical assistance provided
- Commendations

Once all corrective action items have been submitted to the SA and approved for acceptance, including but not limited to submission of documents, written confirmation of tasks completed, etc., a closure letter will be sent to the SFA.

Failure to submit the required Corrective Action by the due date (or request an extension) will result in payments being withheld until the review is finalized.

### **Why is the Administrative Review Important?**

The review process allows SFAs to demonstrate compliance with federal regulations. Demonstrating compliance is important to ensure the SFA continues receiving reimbursement for the operation of Child Nutrition Programs. The review provides an opportunity to ask questions of the SA and receive technical assistance in areas that are challenging for the SFA. Many sponsors find this one-on-one assistance helps streamline certain areas of the program. Additionally, the review addresses problems and helps correct mistakes before they become significant. The process of review allows for changes to be made as it pulls together the food service director, business manager, and the superintendent of the district. At times the food service director may lack the support they need to better the program until these key stakeholders are on board. The review process brings everyone to the table allowing for better access to information and encourages discussions on ways to improve the program.

### **Resources**

Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides and helpful links to relevant subject matter.